

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

In Re: :
:
PRESIDENTIAL GOLF PARTNERS, LLC : Case No. 08-15654-RGM
: Chapter 7

OBJECTION TO TRUSTEE'S NOTICE OF ABANDONMENT

COME NOW, Creditor Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks, by and through undersigned counsel, and as its Objections to Trustee's Notice of Abandonment of Personal Property respectfully states as follows:

1. This Court has jurisdiction of this case pursuant to 28 U.S.C. Section 1334 and 28 U.S.C. Section 157. This Objection is a core proceeding arising under the Code.
2. This case commenced by Voluntary Chapter 7 Petition on September 16, 2006.
3. On September 17, 2008, Robert Ogden Tyler was appointed as interim trustee in this case.
4. Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks provided materials to the Debtor pre-petition in connection with the construction of improvements built on the real property that was the subject of the lease described in the Trustee's Notice of Abandonment.
5. Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks is a mechanic's lien claimant and has certain rights and/or claims pursuant to Virginia mechanic's lien statutes and otherwise.
6. Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks joins with the parties who have previously objected to the Trustee's Notice of Abandonment of Personal Property including Metro Painters, Inc., Adrian L. Merton, Inc., Jefferson Millwork & Design, Inc. K.T. Enterprises, Inc., P.E. Sediment Control, Inc., Paradigm Service Group, LLC and United Foundations, Inc.

7. Further, as a mechanic's lien claimant, to the extent the abandonment relates to the leasehold interest, Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks desires the record to be clear that the proposed abandonment is without prejudice to the rights of Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks under state law to pursue their mechanic's lien claims or other such claim.

WHEREFORE, Ferguson Enterprises, Inc. d/b/a Ferguson Waterworks requests that this Court enter an order sustaining this Objection and granting such other relief as is appropriate.

November 18, 2008

Respectfully submitted,

LAW OFFICE OF JILL D. CARAVAGGIO

/s/ Jill D. Caravaggio
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Attorney for Creditor Ferguson Enterprises, Inc.
d/b/a Ferguson Waterworks

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of November, 2008, a true and correct copy of the foregoing Objection to Trustee's Notice of Abandonment was served via the Court's ECF system or via first class mail, postage prepaid to the following:

Robert O. Tyler, Esquire
Tyler Bartl Ramsdell & Counts
700 S. Washington Street, #216
Alexandria, VA 22314
Trustee

D. Marc Sarata, Esquire
Stephen E. Leach, Esquire
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Counsel for Debtor

/s/ Jill D. Caravaggio
Jill D. Caravaggio